

The NTIA has developed a comprehensive study investigating the negative effects of radiated RF from power lines carrying BPL technology. It is clear from the NTIA report that Radiated RF from BPL WILL extend farther away from Power lines than previously reported by industry funded studies and measurements. Clearly as the NTIA notes that degradation extends well beyond 450 feet. Most licensed Amateur radio stations are contained within one's own single family dwelling of lot sizes that make it physically impossible to mitigate the interference by relocation of antennas. The residential Amateur radio station will be the "hot Zone" for radiated signal. It will be analogous to one standing on the shoulder of a busy 6 lane Highway trying to call for road service unable to hear the call due to high ambient noise level. This could mean the Federally licensed amateur operator will be at a distinct disadvantage when time comes to aid local, State or Federal agencies in time of disaster relief. Potentially over 700,000 licensed Amateur radio operators will further negatively affected by the RF Radiated from BPL in addition to Federal agencies requiring Part 15 interference free operation as mandated by law. The NTIA also makes strong arguments for the careful use of minimum power and use of frequencies for BPL operation that do not overlap important Federally licensed services. With recent debate and testing of BPL several Foreign countries have rejected it as unworkable with respect to interference of licensed users. Some industry groups have commented that these countries were using old technology and these new 3rd generation BPL systems do not cause interference. That simply cannot be true, the laws of Physics and RF do not change with later technology, Power lines will radiate as unintentional radiators period. Lastly, NTIA makes a further strong point that the Proposed Part 15 measurement rules are not adequate to effectively measure radiated BPL signals with a loop antenna close to the ground. Better Part 15 measurement techniques must be adopted in order to prevent underestimating the levels of RF radiated. NTIA could not predict the effects of aggregated radiated signals and those that WILL propagate, this RF cannot be contained within the USA border, thus potentially affecting other countries (who may have already rejected BPL). Do not merely rely on industry generated studies, the capital outlay to bring BPL to a sole user out in the country is prohibitive and thusly BPL can only be cost effective for industry if deployed in urban (high density) areas, as NTIA could not report on the effects of Licensed Radio users signals on the stability of the BPL network and could be prone to outage.